

FILED

DEC 22 2016

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

RODNEY TATE and
RONALD JOHNSON,

Defendants.

4:16CR560 RLW/DDN

INDICTMENT

COUNTS 1-4

(False Statements)

1. At all times relevant to this indictment, Defendant **RODNEY TATE**, hereinafter referred to as "**TATE**," was serving a term of federal supervision and was being supervised by the United States Probation Office in the Eastern District of Missouri. As part of its duties of supervision, the United States Probation Office was required to verify **TATE**'s employment and his payment of any restitution that he owed.

2. At all times relevant to this indictment, Defendant **RONALD JOHNSON**, hereinafter "**JOHNSON**," was president of Kaiser & Johnson Export Packaging Service, Inc., hereinafter referred to as "Kaiser & Johnson."

3. At some time prior to March 17, 2015, **TATE** falsely advised his Probation Officer that he was employed by Kaiser & Johnson, when he well knew that he was not

employed by Kaiser & Johnson. **TATE** also submitted false and fraudulent pay stubs from Kaiser & Johnson to his Probation Officer as proof of employment.

4. On March 17, 2015, the United States Attorney's Office commenced a civil action in the United States District Court for the Eastern District of Missouri in order to obtain restitution payments through a garnishment order which sought the withholding of a portion of **TATE'S** salary by Kaiser & Johnson.

5. On or about April 20, 2015, **JOHNSON** filed an answer to the civil action regarding the garnishment proceedings initiated by the United States Attorney's Office. In his answer, **JOHNSON** falsely and fraudulently claimed that **TATE** had gross earnings of \$574.00 between March 30, 2015 and April 5, 2015, and that Kaiser & Johnson had withheld a portion of **TATE'S** earnings in order to pay **TATE'S** federal, state, and local taxes, well knowing that these claims were false and fraudulent when **JOHNSON** made them.

6. On or about the dates listed below, within the Eastern District of Missouri, the defendants

RODNEY TATE and RONALD JOHNSON,

in a matter within the jurisdiction of the United States Probation Office, an agency of the United States of America, did willfully and knowingly make and use and cause to be made and used, a false writing and document containing a materially false statement, knowing the same to contain such statements, in that, on a document titled "Monthly Supervision Report" submitted to the United States Probation Office, the defendants stated and represented and caused to be stated and represented that **RODNEY TATE** was employed by Kaiser & Johnson Export Packaging Inc., and submitted the supporting documents listed below as verification, whereas, in

<u>COUNT</u>	<u>DATE</u>	<u>SUPPORTING DOCUMENT</u>
1	April 6, 2015	Pay Stub for Check Number 24542
2	June 8, 2015	Pay Stub for Check Number 24735
3	August 5, 2015	Pay Stub for Check Number 24911
4	September 14, 2015	Pay Stub for Check Number 25025

All in violation of Title 18, United States Code, Sections 1001 and 2.

A TRUE BILL.

FOREPERSON

RICHARD G. CALLAHAN
United States Attorney

TRACY LYNN BERRY - 014753 TN
Assistant United States Attorney